REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Status of Claims:

No claims are currently being cancelled or added.

Claims 1, 6, 12, 24 and 25 are currently being amended, whereby support for the features added to claims 1, 24 and 25 may be found, for example, on page 9 of the specification. Support for the features added to claim 12 may be found, for example, on page 11 of the specification. Support for the features added to claim 6 may be found, for example, on page 13 of the specification.

This response amends claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claims remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 1-25 are pending in this application.

Claim Rejections - 35 U.S.C. § 112, 1st Paragraph:

In the Office Action, claims 1-25 were rejected under 35 U.S.C. § 112, 1st Paragraph, as failing to comply with the written description requirement. By way of this amendment and reply, the claim language asserted in the Office Action as failing to comply with the written description requirement has been removed from the claims, thereby mooting this rejection.

Claim Rejections - Prior Art:

In the Office Action, claims 1, 4-6, 10-15, 24, and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,678,867 to Fong et al. (hereafter "Fong"). Claims 2, 3, 7-9, and 16-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong in view of U.S. patent application 2002/0026461 to Kutay et al. (hereafter "Kutay"). Applicant respectfully traverses these rejections for at least the following reasons.

Presently pending independent claims 1, 24 and 25 have been amended to recite:

selecting, by a user by way of a first user command, whether or not to automatically create or to allow the user to create business rules for moving data from a source file to a target file for a plurality of defining items in the source model, and wherein the target model

and the source model are created <u>based in part on</u> a <u>second</u> user command to initiate creation of such models automatically.

Fong does not teach or suggest the capability of inputting a first user command to allow a user to decide whether or not to automatically create business rules or to have the user himself/herself create the business rules for moving data from a source file to a target file for a plurality of defining items in a source model. Furthermore, Fong does not teach or suggest that the target model and the source model are created based in part on a second user command to initiate creation of such models automatically.

Column 3, lines 20-31 of Fong describes that a user is provided a tool to define the transformation of an SGML document into an HTML document, whereby no description is made as to creation of a target model or a source mode automatically based on a user command.

Column 3, lines 54-67 of Fong describes a user interface to provide a user with selectable options for assigning attribute values for target components, whereby no description is made as to creation of a target model or a source mode automatically based on a user command.

Column 4, lines 1-10 of Fong describes transformation rules that are processed by a map create to create a transformation map, whereby no description is made as to creation of a target model or a source mode automatically based on a user command.

Since Kutay does not rectify the above-mentioned shortcomings of Fong, each of the presently pending claims is patentable over the cited art of record.

Additionally, dependent claim 12 has been amended to recite features of the flat file or database model that are not taught or suggested by the cited art of record, when taken as a whole. Thus, claim 12 is patentable for these additional reasons, beyond the reasons given above for its base claim 1.

Still further, dependent claim 6 has been amended to recite <u>providing a plurality of rule builder icons on the single display respectively adjacent to a plurality of data model items, wherein selection of one of the rule builder icons provides for a window to open up on the single display to allow the user to create a rule for the adjacent data model item. Such features that allow a user to create rules specific to particular data model items by selection of a particular icon on a single display, are not disclosed or suggested either Fong or by Kutay, alone or in combination.</u>

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Conclusion:

Since all of the issues raised in the Office Action have been addressed in this response, Applicant believes that the present application is now in condition for allowance, and an early indication of allowance is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741.

If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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